

**COMMUNITY INVOLVEMENT PLAN
TITANIUM METALS CORPORATION
HENDERSON, NEVADA**

Prepared for:

Titanium Metals Corporation
P.O. Box 2128
Henderson, Nevada 89009-7003

and

State of Nevada
Department of Conservation and Natural Resources
Division of Environmental Protection
1771 E. Flamingo Road, Suite 121-A
Las Vegas, Nevada 89118-0837

Prepared by:

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April, 2007

April 12, 2007

Project No. 04-01-101-001

State of Nevada
Department of Conservation and Natural Resources
Division of Environmental Protection
1771 E. Flamingo Road, Suite 121-A
Las Vegas, Nevada 89118-0837

Attn: Mr. Brian Rakvica

Re: Revised and Final Community Involvement Plan, Titanium Metals Corporation
(TIMET) Facility, Henderson, Nevada

Dear Mr. Rakvica:

Attached is a revised and final Community Involvement Plan as originally requested in your correspondence dated December 7, 2006 and revised as requested in your correspondence dated March 21, 2007. If you have any questions regarding this document, please do not hesitate to contact me.

Sincerely,
BROADBENT & ASSOCIATES, INC.

Kirk J. Stowers, EM #1549 (exp. 10/11/07)
Associate Geologist

JURAT: I, Kirk J. Stowers, hereby certify that I am responsible for the services described in this document and for the preparation of this document. The services described in this document have been provided in a manner consistent with the current standards of the profession and to the best of my knowledge comply with all applicable federal, state and local statutes, regulations and ordinances

cc: Craig Wilkinson – TIMET
James I. Gibson Public Library – Henderson, Nevada
Jim Najima – NDEP, Carson City
Dante Pistone – NDEP, Carson City
Brenda Pohlmann – City of Henderson
Ranajit Sahu – BRC
Susan Crowley – TRONOX
Chris Silva – Pioneer Companies, Inc.
Joe Kelly – Montrose Chemical Corporation of California
George Crouse – Syngenta Crop Protection
Victoria Coker – Tyson Contracting, Inc.
Kathy Allford – T2 Environmental
Candace Friday – Tetra Tech EM Inc.

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FIGURE

Figure 1: Site Location Map

1.0 Introduction

This Community Involvement Plan (CIP) serves to comply with the requirements of Item V of the BMI Common Areas Phase II Consent Agreement (Phase II Consent Agreement) dated February, 1996 between the Nevada Division of Environmental Protection (NDEP), Titanium Metals Corporation (TIMET) (hereafter referred to as the “Property”), and other Black Mountain Industrial (BMI) Complex facilities. In addition, this CIP is provided in response to a specific request from the NDEP dated December 7, 2006.

The general goal of this CIP is to facilitate notification to the community of environmental characterization activities and, if necessary, remediation activities at the TIMET industrial facility in Henderson, Nevada. Specifically, and in accordance with Item V of the Phase II Consent Agreement, the CIP should provide for:

- a. The periodic development and distribution of a fact sheet summarizing current and / or proposed activities.
- b. The development of a mailing list for distribution of the fact sheets.
- c. The establishment of an information and document repository at or near the Property with public access during business hours for inspection and copying of such information and documents; and
- d. Identification of a community liaison for TIMET with respect to activities to be conducted pursuant to any workplans that are or will be prepared to document work associated with the Property.

The following sections describe the TIMET facility, the impetus for the environmental work that is being performed at the TIMET facility, and the manner in which TIMET intends to meet facilitate notification to the community of environmental characterization activities.

2.0 Property Location and Setting

The TIMET facility, which is part of the BMI Complex, is located in the City of Henderson in unincorporated Clark County, Nevada, near the southeast margin of the Las Vegas Valley. [Figure 1](#) shows the location of the site. The TIMET plant site comprises approximately 180 acres and includes management and operations buildings, process

buildings and units, maintenance shops, landfill, material and equipment storage areas, retention ponds, tanks, roads and railroads. The TIMET facility is used mainly for the manufacture of titanium industrial products, including titanium sponge, ingot, and titanium tetrachloride.

3.0 General Property History

In 1941, approximately 5,000 acres of empty desert in the southeastern quadrant of the Las Vegas Valley was deeded by the United States for use as the site of what was to become the world's largest magnesium plant, a plant which came to play a critical role in World War II. Following cessation of magnesium production activities in 1944, agencies of the U.S. Government worked to attract industries to the site.

In 1949, the State of Nevada, through the Colorado River Commission ("CRC") purchased the Basic Magnesium, Inc., facilities and associated real properties and took possession of the entire Industrial Complex from the U.S. Government.

Beginning in 1952, National Lead Company (now TIMET), purchased the existing plant site. Although the technology of titanium production has changed since 1952, the facility has been used exclusively for titanium production since that time.

4.0 Scope of the Community Involvement Plan

The following components of the CIP are proposed to accomplish the goals outlined in Section 1.0.

- Establish a Fact Sheet summarizing current and / or proposed activities.
- Ensure that the Fact Sheet is available to the public.
- Establish a Document Repository for historic and current documents relevant to characterization and remediation activities associated with the TIMET facility;
- Provide a mechanism to update to maintain and update the CIP periodically, if it becomes necessary or appropriate;
- Provide a community liaison with respect to activities to be conducted pursuant to workplans that are or will be prepared to document work associated with the Property.

5.0 Responsibility for CIP Implementation

Titanium Metals Corporation will have the responsibility for implementation and periodic modification of the Community Involvement Plan.

6.0 Regulatory Aspects of the Community Involvement Plan

The State of Nevada, Department of Conservation, Division of Environmental Protection has primary authority and responsibility for regulatory oversight of characterization and remediation activities associated with the TIMET facility. In 1991, the NDEP entered into a Consent Agreement with TIMET in which the following three phases of work were identified:

- Phase I – Develop a Phase I environmental conditions assessment (ECA) report for the TIMET site.
- Phase II – Perform an environmental conditions investigation (ECI) to fill data gaps identified in Phase I, if determined necessary by NDEP.
- Phase III – Identify and implement appropriate remedial measures to address conditions identified in Phases I and II, if determined necessary by NDEP.

TIMET completed a Phase I ECA, and results of the ECA were presented in the “Final Report of Phase I Environmental Conditions Assessment” ([Law Engineering, Inc. 1993](#)). Based on the information in the TIMET Phase I ECA and subsequent discussions with TIMET, NDEP entered into a Consent Agreement with TIMET to perform an ECI, remedial alternative studies, interim remedial measures, and additional work. Results of the ECI were reported in the “Final Environmental Conditions Investigation Report” ([Tetra Tech 1998](#)) and the “Environmental Conditions Investigation Addendum Draft Report” ([Tetra Tech 1999](#)). TIMET received correspondence from NDEP dated December 1, 2003, that provided NDEP’s responses to the ECI addendum (ECIA) report and TIMET received additional correspondence from the NDEP dated December 11, 2003, in which the NDEP recommended accelerated work to abate, mitigate, and eliminate environmental contaminants. This CIP provides a mechanism to inform the

public about work that is being performed to abate, mitigate, and eliminate environmental contaminants with regard to potential groundwater contamination.

7.0 Public Involvement Activities

The purpose of the public involvement activities is to inform the community about the status of the ongoing environmental characterization and remediation activities relative to the TIMET facility and to facilitate public involvement in the decision-making process regarding future activities at the site. Per the provisions of the Phase II Consent Agreement, the following items are addressed in Subsections 7.1 through 7.4: the development and distribution of a Fact Sheet, the development of a mailing list for distribution of the Fact Sheet, the establishment of an information and document repository, and identification of a community liaison.

7.1 Development / Distribution of a Fact Sheet

A Fact Sheet for the TIMET facility was prepared in November of 2005 and was submitted for publication on the NDEP website. The web site address for the Fact Sheet is http://www.ndep.nv.gov/bmi/docs/timet_fs.pdf. It is anticipated that the Fact Sheet on the NDEP website will be updated by TIMET on an annual basis. Under this schedule, the Fact Sheet is currently due for an update.

7.2 Public Notification and Fact Sheet Mailing List

TIMET currently has a public notification policy for distributing information regarding plant operations to the public. Such public notification is generally achieved by the publication of relevant information in the Las Vegas Review Journal and the Henderson Home News. This public notification process can be expanded to include public notification of not only plant operations, but environmental characterization and remediation activities as well.

In addition, TIMET will prepare a mailing list comprised of suitable stakeholders. Distribution of information by way of this mailing list could be performed when mutually agreed upon by TIMET and NDEP. It is anticipated that the mailing list would, at a minimum, be comprised of the following stakeholders: near neighbors to the facility, residents and businesses in the vicinity of environmental media impacted by the TIMET facility, the City of Henderson, Clark County, and the State of Nevada.

7.3 *Information and Document Repository*

Basic Remediation Company (BRC) has stated their intent to construct an Information and Document Repository in Henderson, Nevada (Repository). BRC has indicated that TIMET will be allowed to provide a computer / database within the Repository to make selected documents available to the general public for review. It is anticipated that these documents will include, at a minimum:

- This Community Involvement Plan
- Quarterly Monitoring and Sampling Reports
- Data Validation Summary Reports for Relevant Data
- Potential Source Area Technical Memorandum
- Background Shallow Soil Technical Memorandum
- Conceptual Site Model – 2004 Version
- Conceptual Site Model – 2007 Version
- Groundwater Monitoring Well Network Technical Memorandum
- Screening Levels Technical Memorandum
- Environmental Conditions Report - 1998
- Environmental Conditions Report Addendum - 1999
- Revised Environmental Conditions Report Addendum - 2005
- 2005 Sampling and Analysis Plan
- Other Documents as Requested by the NDEP

The Repository was originally intended to be constructed as an addition to the James I. Gibson Public Library in Henderson, Nevada. However, the City of Henderson has since indicated that they do not desire such an addition. As a result, the final location of BRC's Repository has not been determined. In the interim, TIMET intends to provide the aforementioned documents in a disk format to the Gibson Public Library. These disks will be kept in the "Nevada Room" section of the library. Monthly, a representative from TIMET will evaluate the condition and availability of the disks to determine whether any of the disks are damaged or missing. Damaged or missing disks will be replaced immediately upon discovery of their condition.

In addition, the NDEP has indicated that the aforementioned documents are available at their Las Vegas and Carson City offices. It is also anticipated that these

documents may eventually be located on the NDEP's website at <http://www.ndep.nv.gov/bmi/timet.htm> assuming that a mechanism to post such large files on the website can be devised.

7.4 Identification of a Community Liaison

The designated Community Liaison for the TIMET facility as regards environmental issues is Mr. Craig Wilkinson. Mr. Wilkinson is the Western Regional Manager for Health, Safety, and Environmental Affairs for TIMET. Mr. Wilkinson can be reached at (702) 566-4453 or correspondence can be sent to him at Titanium Metals Corporation at P.O. Box 2128 in Henderson, Nevada.

8.0 Closure

This report has been prepared for the exclusive use of Titanium Metals Corporation. Our services were performed in accordance with the generally accepted standard of practice at the time this report was written. No warranty, expressed or implied, is intended.

9.0 References

- Law Engineering. 1993. "Phase I Environmental Conditions Assessment, Titanium Metals Corporation, Henderson, Nevada." April.
- Tetra Tech EM Inc. (Tetra Tech). 1998. "Final Environmental Conditions Investigation Report, Titanium Metals Corporation, Henderson, Nevada." October 15.
- Tetra Tech. 2005. "Environmental Conditions Investigation Addendum – Final Report, Titanium Metals Corporation Facility, Henderson, Nevada." January 7.

FIGURE